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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

v.

EAGLE EYES TRAFFIC INDUSTRIAL
CO., LTD.; E-LITE AUTOMOTIVE,
INC.; HOMY HONG-MING HSU; and
YU-CHU LIN, aka David Lin,

Defendants.

No. CR 11-0488 RS

**JOINT STIPULATION
FOR PRETRIAL SCHEDULING AND
—[PROPOSED] ORDER**

The United States and Defendants Eagle Eyes Traffic Industrial Co., Ltd., E-Lite Automotive Inc., and Homy Hong-Ming Hsu hereby stipulate and agree:

1. Defendants may file a motion for a bill of particulars on or before February 7, 2012, to be heard at the status conference the Court has set for March 6, 2012 at 2:30 p.m. Other initial motions may also be filed to be heard at that time.
2. The pretrial conference contemplated by Crim. L.R. 17.1-1(a) shall be June 5, 2012, at 1:30 p.m.
3. The attorneys for the government and defendants have conferred with respect to a schedule for disclosures in accordance with Crim. L.R. 16-1(a). The government

1 attorneys represented that they would undertake to make available substantially all
2 the then-existing material required by Fed. R. Crim. P. 16(a)(1)(A)-(F) by January
3 31, 2012, and the material required by *Brady* and *Giglio* and Jencks Act witness
4 statements by February 15, 2012. Defendants will make available any reciprocal
5 discovery under Crim. L.R. 16(b)(1)(A) and (B) and the government will make
6 available any additional disclosures under Crim. L.R. 16(c)(1)-(4) by May 4, 2012,
7 unless on that date there is a motion pending for a trial continuance. The parties
8 have not yet otherwise reached agreement.

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10 4. Motions, including any with regard to experts, will be heard on May 8, 2012.
11 Motions *in limine* may also be heard at the pretrial conference.

12 5. The parties agree the following briefing schedule shall govern the filing of all
13 pretrial motions, including for bills of particular under Fed. R. Crim. P. 7(f),
14 except for motions *in limine*:

15 a. On or before 28 days before the hearing date, the parties will file initial
16 moving papers;

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18 b. On or before 14 days before the hearing date, the parties will file
19 opposition papers;

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c. On or before 7 days before the hearing date, the parties will file and serve any reply papers.

IT IS SO STIPULATED.

DATED: January 19, 2012

/s/

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IT IS SO STIPULATED.

DATED: January 19, 2012

/s/

BECKY WALKER JAMES
Attorney for Defendant Horny Hong-Ming Hsu

IT IS SO STIPULATED.

DATED: January 19, 2012

/s/

KENNETH JULIAN
Attorney for Defendants Eagle Eyes Traffic
Industrial Co., Ltd. and E-Lite Automotive, Inc.

IT IS SO ORDERED.

DATED: 1/19, 2012



Honorable Richard Seeborg
United States District Judge